REMARKS

Applicant respectfully requests reconsideration and allowance of all of the claims of the application. The status of the claims is as follows:

- Claims 1-13 and 15-20 are currently pending.
- Claims 1, 2, 3, 11, 16, and 18 are amended herein.
- Claims 14 and 21 are canceled herein.

Cited Documents

The following documents have been applied to reject one or more claims of the Application:

- P3P; Introduction to P3P Chapter 1, CH01.5101, retrieved at <<www.p3pbook.com/ch01.pdf>> July 25, 2002, pp#3-pp#11.
- Silicon Press:" Platform for privacy preferences (P3P) technology brief" 2002.
- Koike: Koike, Yuichi, U.S. Patent Application Publication No. 2003/0084300.
- W3Schools, "Introduction to XSL", retrieved at <<www.w3schools.com>> on 12/12/08.

§ 103 Rejections: P3P, Silicon Press, and Koike

Claims 1-6, 8-13 and 15-20 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over P3P in view of Silicon Press and in further view of Koike. Applicant respectfully traverses the rejection.

Independent Claim 1

Applicant submits that amendments to claim 1 render the pending § 103 rejections moot. Applicant submits that the combination of P3P, Silicon Press, and Koike does not teach or suggest at least the following features of this claim, as amended (with emphasis added):

- *storing the identified specific portions of the Web site privacy policy to a conflict bucket of the client computer, the conflict bucket limited to the specific portions of the Web site privacy policy that conflict with the user concerns.*
- *combining the identified specific portions from the conflict bucket with non-conflicting portions of the Web site privacy policy to a user interface,* the user interface including a single instance of each element of the Web site privacy policy.
- *displaying the user interface* onto the display device, the identified specific portions appearing before the non-conflicting portions of the user interface.

Applicant first submits that the combination of P3P, Silicon Press, and Koike does not teach or suggest "*storing the identified specific portions of the Web site privacy policy to a conflict bucket of the client computer, the conflict bucket limited to the specific portions of the Web site privacy policy that conflict with the user concerns*" as recited in Applicant's claim 1. (Emphasis added).

The Office generally cites Koike as allegedly teaching or suggesting the elements of claim 1 as follows: "Koike teaches wherein a controller outputs data indicative of inconsistency between the privacy preference and the privacy policy [0039]." (Office

Action, page 4, lines 3-4). Koike generally pertains to "a method of administrating data including privacy of a user in communication made between a server and a terminal device of the user in a system." (Paragraph [0053]). Specifically, "a privacy data administrator *connected between a server and a terminal of device*" includes "a third memory *storing therein both data indicative of results of comparison* of the privacy preference and the privacy policy to each other, and the reply having been made in response to the inquiry, and a privacy data filter of a user for administrating data including privacy." (Paragraphs [0036] and [0047], emphasis added).

Applicant submits that Koike fails to teach or suggest the elements of claim 1 since Koike stores the "data indicative of inconsistency between the privacy preference and the privacy policy" *to a third memory of "a privacy data administrator connected between a server and a terminal of device*." (Paragraphs [0036] and [0039] and figure 1, emphasis added). In other words, Koike stores the data indicative of inconsistency between the privacy preference and the privacy policy" to a memory location outside of the client device (paragraph [0039] and figure 1) rather than to "a conflict bucket of the client computer" as recited in Applicant's claim 1.

Moreover, Applicant further submits that the third memory of Koike stores more than just conflict data. Specifically, Koike discusses storing "data indicative of results of comparison of the privacy preference and the privacy policy to each other, *and the reply having been made in response to the inquiry, and a privacy data filter* of a user for administrating data including privacy" (paragraph [0047], emphasis added) rather than "the conflict bucket *limited to* the specific portions of the Web site privacy policy that conflict with the user concerns" as recited in Applicant's claim 1. (Emphasis added).

P3P and Silicon Press fail to remedy the deficiencies in Koike noted above with respect to claim 1. P3P generally discusses: "P3P user agents typically allow users to specify their privacy preferences so that they can automatically compare a web site's policies to these preferences." (Page 7). Specifically, P3P discusses an AT&T Privacy Policy that displays "a green, "happy" bird icon at sites with P3P policies that match a user's privacy preferences and a red, "angry" bird icon at sites with P3P policies that do not match a user's preferences, Users can click on the bird icon to view a summary of the site's privacy policy that is generated automatically from the site's P3P policy." (*Id.*). Applicant submits that P3P fails to remedy the deficiencies in Koike noted above with respect to claim 1 since P3P generates "a summary of the site's privacy policy" (*id.*) rather than "storing the identified specific portions of the Web site privacy policy to a conflict bucket" as recited in Applicant's claim 1.

Silicon Press generally pertains to "a protocol standard being developed by W3C, to address user privacy concerns." (Page 2). Silicon Press discusses: "[u]pon getting the privacy policy, the browser compares it with the user's preferences . . . In case of a conflict, the browser alerts the user who can then decide how to proceed." (Page 3). Accordingly, although Silicon Press discusses comparing "the privacy policy . . . with the user's preferences" (*id.*), Applicant submits that Silicon Press is silent as to "storing the identified specific portions of the Web site privacy policy to a conflict bucket" as recited in Applicant's claim 1.

Applicant further submits that the combination of P3P, Silicon Press, and Koike does not teach or suggest "*combining the identified specific portions from the conflict bucket with non-conflicting portions of the Web site privacy policy to a user interface,*

the user interface including a single instance of each element of the Web site privacy policy" as recited in Applicant's claim 1. (Emphasis added).

P3P discusses generating a "summary of the site's privacy policy" (page 7); however, the summary "is generated automatically from the site's P3P policy" rather than "combining the identified specific portions *from the conflict bucket* with non-conflicting portions" as recited in Applicant's claim 1. (Emphasis added).

Silicon Press and Koike fail to remedy the deficiencies in P3P noted above with respect to claim 1 as Silicon Press and Koike are silent with respect to the above recited element of claim 1. Specifically, Silicon Press discusses generating an alert "[i]n the case of a conflict" (page 3) rather than "combining the identified specific portions from the conflict bucket with non-conflicting portions" as recited in Applicant's claim 1. Furthermore, Koike discusses: "If the privacy policy 30b is judged to be unacceptable to a user, the comparator 104 outputs not only the results of comparison, but also data indicative of inconsistency between the privacy policy 30b and the privacy preference 50b." (Paragraph [0121]). Accordingly, Applicant submits that Koike states outputting conflicting data rather than "combining the identified specific portions from the conflict bucket with non-conflicting portions of the Web site privacy policy to a user interface, *the user interface including a single instance of each element of the Web site privacy policy*" as recited in Applicant's claim 1.

Consequently, P3P, Silicon Press, in view of Koike does not teach or suggest all of the elements and features of claim 1. Accordingly, Applicant respectfully requests that the rejection of claim 1 be withdrawn. Due to Applicant's earnest belief that claim 1, as rejected under Section 103, is allowable for reciting elements which are not taught or

suggested in the combination of P3P, Silicon Press, and Koike, Applicant will not address motivation to combine the P3P, Silicon Press, and Koike reference with respect to claim 1 during this response. However, Applicant hereby reserves the right to further challenge the motivation to combine the P3P, Silicon Press, and Koike references.

The amendments to claim 1 are supported by the specification at least at paragraph [0025]. No new matter is added.

Dependent Claims 2-6 and 8-10

Claims 2-6 and 8-10 ultimately depend from independent claim 1. As discussed above, claim 1 is believed allowable over the cited art. Therefore, claims 2-6 and 8-10 are also allowable over the combination of P3P, Silicon Press, and Koike at least for their dependency from an allowable base claim. Claims 2-6 and 8-10 may also be allowable for the additional features recited.

Independent Claim 11

Applicant submits that amendments to claim 11 render the pending § 103 rejections moot. Applicant submits that the combination of P3P, Silicon Press, and Koike does not teach or suggest at least the following features of this claim, as amended (with emphasis added):

- store the identified specific portions of the privacy policy file *to a conflict bucket located at a client computing device.*

Applicant submits that the combination of P3P, Silicon Press, and Koike does not teach or suggest the cited element of claim 11. Specifically, Koike discusses a privacy data administrator to compare "the privacy preference and the privacy policy to each

other." (Paragraph [0046]). However, the "privacy data administrator 100 is located *between the server 110 of a service provider and the terminal device 120 of a user*" (paragraph [0083]) rather than "located at a client computing device" as recited in Applicant's claim 11.

Moreover, P3P and Silicon Press fail to remedy the deficiencies in Koike noted above with respect to claim 11 as P3P and Silicon Press are silent with respect to the above recited element of claim 11.

Consequently, P3P, Silicon Press, in view of Koike does not teach or suggest all of the elements and features of claim 11. Accordingly, Applicant respectfully requests that the rejection of claim 11 be withdrawn.

Dependent Claims 12-13 and 15

Claims 12-13 and 15 ultimately depend from independent claim 11. As discussed above, claim 11 is believed allowable over the cited art. Therefore, claims 12-13 and 15 are also allowable over the combination of P3P, Silicon Press, and Koike at least for their dependency from an allowable base claim. Claims 12-13 and 15 may also be allowable for the additional features recited.

Independent Claim 16

Applicant submits that amendments to claim 16 render the pending § 103 rejections moot. Applicant submits that the combination of P3P, Silicon Press, and Koike does not teach or suggest at least the following features of this claim, as amended (with emphasis added):

- *adding metadata to the privacy policy statements' internal representation of the conflicting statements*, the metadata to trigger additional details within the privacy policy statements to be emphasized during a transforming of the privacy policy statements.

The Office generally cites P3P as allegedly teaching or suggesting the cited elements of claim 16. In P3P, when a site does not match a user's preferences, "a summary of the site's privacy policy . . . is generated automatically from the site's P3P policy" to explain "where the policy differs from the user's preferences." (Page 7). Applicant submits that the generation of the summary including explaining the differences fails to teach or suggest the elements of Applicant's claim 16 since P3P is silent as to "adding metadata" as recited in Applicant's claim 16. Rather, P3P simply generates the summary "from the site's P3P policy." (*Id.*).

Moreover, Silicon Press and Koike fail to remedy the deficiencies in P3P noted above with respect to claim 16 as Silicon Press and Koike are silent with respect to the above recited element of claim 16.

Consequently, P3P, Silicon Press, in view of Koike does not teach or suggest all of the elements and features of claim 16. Accordingly, Applicant respectfully requests that the rejection of claim 16 be withdrawn.

The amendments to claim 16 are supported by the specification at least at paragraph [0054]. No new matter is added.

Dependent Claims 17-20

Claims 17-20 ultimately depend from independent claim 16. As discussed above, claim 16 is believed allowable over the cited art. Therefore, claims 17-20 are also allowable over the combination of P3P, Silicon Press, and Koike at least for their

Serial No.: 10/693,333
Docket No.: MS1-1755US
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dependency from an allowable base claim. Claims 17-20 may also be allowable for the additional features recited.

§ 103 Rejections

Claim 7 stands rejected under 35 U.S.C. § 103(a) as allegedly being obvious over P3P in view of Silicon Press in view of Koike and in further view of W3Schools. Applicant respectfully traverses the rejection.

Dependent Claim 7

Claim 7 depends from independent claim 1. Given the evidence and arguments as well as clarifying amendments for claim 1, Applicant respectfully submits that P3P, Silicon Press, Koike, and W3Schools, in combination, fail to render the claimed subject matter obvious. Specifically, as stated above, P3P, Silicon Press, and Koike do not teach or suggest "*combining the identified specific portions from the conflict bucket with non-conflicting portions of the Web site privacy policy to a user interface*, the user interface including a single instance of each element of the Web site privacy policy", as recited in Applicant's claim 1. (Emphasis added). Moreover, W3Schools is also silent with respect to this element of claim 1. Accordingly, claim 7 is allowable for at least its dependency on an allowable base claim, as well as for additional subject matter recited.

Conclusion

If any issues remain that would prevent allowance of this application, Applicant requests that the Examiner contact the undersigned representative before issuing a subsequent Action.

Respectfully Submitted,

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Dated: 5 February 2010

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